

**REMARKS**

At the outset, Applicants thank the Examiner for the thorough review and consideration of the pending application. The Office Action dated May 4, 2006 has been received and its contents carefully reviewed.

Claims 1–27 are currently pending, with claims 16-27 having been withdrawn. Reexamination and reconsideration of the pending claims are respectfully requested.

In the Office Action, claims 1 and 3-15 are rejected under 35 U.S.C. §103(a) as being unpatentable over US Patent Publication 2002/0030657 to Kondo et al. (hereinafter “Kondo”) in view of US Patent Publication 2002/0030657 to Matsushima (hereinafter “Matsushima”). Claim 2 is rejected under 35 U.S.C. §103(a) as being unpatentable over Kondo and Matsushima, and further in view of Yamazaki et al. (hereinafter “Yamazaki”).

The rejection of claims 1 and 3-15 under 35 U.S.C. §103(a) as being unpatentable over Kondo in view of Matsushima is respectfully traversed and reconsideration is requested. Applicants submit that Kondo and Matsushima do not teach or suggest each and every element of the claims.

Claim 1 recites a liquid crystal display having a combination of features including “an interlayer-insulation material formed by an organic insulation film having a dielectric constant less than about 4 and located between the data line and the pixel electrode associated with each of the liquid crystal cells.” In rejecting claim 1, the Examiner correctly acknowledges in the Office Action that Kondo does not teach the quoted feature of claim 1.

The Examiner cites Matsushima to cure the deficiency in the teachings of Kondo, citing FIG. 11 of Matsushima, and identifying the elements of FIG. 11 stating, “See figure 11, element 25: pixel electrode, element 24: insulation film, and element 54: data line.” Applicants respectfully disagree with the Examiner’s conclusion regarding the teachings of Matsushima.

In describing element 54, Matsushima states, “Next, as shown in FIG. 12(e), the source electrode 20a, the drain electrode 21a and the additional capacity upper electrode 54 were formed by using metals such as Al having low resistance. The additional capacity upper electrode 54 was formed so as to cover the inner wall of the contact hole 53. ... In addition, the source bus wiring 20 (see FIG. 10) as well as these electrodes was formed.” See Matsushima, paragraphs [0165]-[0166]. Applicants submit that element 54 is not a data line, but a upper capacity electrode, and that Matsushima does not teach or suggest an organic insulation film having a dielectric constant less than about 4 and located between the data line and the pixel

electrode associated with each of the liquid crystal cells. In Matsushima, as shown in FIG. 10, the interlayer insulation film is formed between the pixel electrode 25 and the additional capacity upper electrode 54 because the source bus wiring 20, (corresponding to the data line of the present invention) is formed together with the source electrode 20a, the drain electrode 21a, and the additional capacity upper electrode 54.

Applicants submit that Kondo and Matsushima, analyzed singly or in combination, do not teach or suggest at least “an organic insulation film having a dielectric constant less than about 4 and located between the data line and the pixel electrode.” Accordingly, Applicants submit that claim 1 is allowable over Kondo and Matsushima.

Applicants note that claims 3-11 each depend from claim 1 and include all of the elements of claim 1. Accordingly Applicants submit that claims 3-11 are each allowable over Kondo and Matsushima at least by way of their respective dependencies and for the reasons given for claim 1.

Claim 12 recites a liquid crystal display having a combination of features including “an interlayer-insulation material formed by an organic insulation film having a dielectric constant less than about 4 and located between the data line and the pixel electrode associated with each of the liquid crystal cells.” In rejecting claim 12, the Examiner alludes to the rationale given in the rejection to claim 1.

Applicants’ argument with respect to claim 1 is equally applicable to claim 12. Applicants submit that Kondo and Matsushima, analyzed singly or in combination, do not teach or suggest at least “an organic insulation film having a dielectric constant less than about 4 and located between the data line and the pixel electrode.” Accordingly, Applicants submit that claim 12 is allowable over Kondo and Matsushima.

Applicants note that claims 13-15 each depend from claim 12 and include all of the elements of claim 12. Accordingly Applicants submit that claims 13-15 are each allowable over Kondo and Matsushima at least by way of their respective dependencies and for the reasons given for claim 12.

The rejection of claim 2 under 35 U.S.C. §103(a) as being unpatentable over Kondo and Matsushima and further in view of Yamazaki is respectfully traversed and reconsideration is requested. Applicants submit that Kondo, Matsushima and Yamazaki do not teach or suggest each and every element of the claim 2.

Claim 2 depends from claim 1 and includes by reference all of the elements of claim 1. As Applicants have discussed above claim 1 is allowable over Kondo and Matsushima. The Examiner cites Yamazaki as teaching, "an interlayer-insulation material includes a benzocyclobutene (BCB) resin film ([0322], lines 1-2)." Applicants do not reach the Examiner's conclusion concerning the teaching of Yamazaki. Applicants submit that Yamazaki does not cure the deficiencies in the teachings of Kondo and Matsushima with respect to claim 1. Applicants submit that Kondo, Matsushima and Yamazaki, analyzed singly or in combination, fail to teach or suggest every element of claim 1. Accordingly, Applicants submit that claim 1, and claim 2 depending therefrom are allowable over Kondo, Matsushima and Yamazaki.

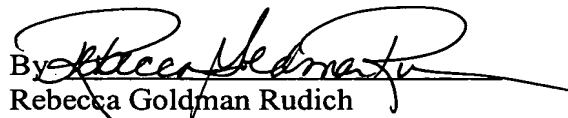
Applicants believe the application is in condition for allowance and early, favorable action is respectfully solicited.

If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at (202) 496-7500 to discuss the steps necessary for placing the application in condition for allowance. All correspondence should continue to be sent to the below-listed address.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. § 1.136, and any additional fees required under 37 C.F.R. § 1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911. A duplicate copy of this sheet is enclosed.

Dated: August 4, 2006

Respectfully submitted,

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Claim 2 depends from claim 1 and includes by reference all of the elements of claim 1. As Applicants have discussed above claim 1 is allowable over Kondo and Matsushima. The Examiner cites Yamazaki as teaching, "an interlayer-insulation material includes a benzocyclobutene (BCB) resin film ([0322], lines 1-2)." Applicants do not reach the Examiner's conclusion concerning the teaching of Yamazaki. Applicants submit that Yamazaki does not cure the deficiencies in the teachings of Kondo and Matsushima with respect to claim 1. Applicants submit that Kondo, Matsushima and Yamazaki, analyzed singly or in combination, fail to teach or suggest every element of claim 1. Accordingly, Applicants submit that claim 1, and claim 2 depending therefrom are allowable over Kondo, Matsushima and Yamazaki.

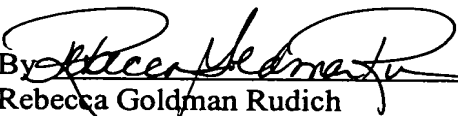
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